

LAGOMARSINO LAW

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JULIAN TOCKER, an individual,

Plaintiff,

vs.

OFFICER ZACHARY GAINEY, an individual;
OFFICER E. ANDERSON, an individual; LAS
VEGAS METROPOLITAN POLICE
DEPARTMENT, a political subdivision; DOES
1 through 10; and ROE CORPORATIONS 1
through 10, inclusive,

Defendants.

CASE NO: 2:25-cv-01050-ART-MDC

**STIPULATION AND ORDER TO EXTEND
THE DEADLINE TO FILE MOTIONS TO
AMEND PLEADINGS OR TO ADD
PARTIES**

(FIRST REQUEST)

IT IS HEREBY STIPULATED AND AGREED between the parties and their undersigned attorneys that the deadline to file motions to amend the pleadings or to add parties is September 18, 2025, be continued for a period of forty-five (45) days from the Court's prior Order (ECF No. 14).

This Request for an extension of time is not sought for any improper purpose or other purpose of delay. This request for extension is based upon the following:

Plaintiff's Counsel served subpoenas to the entities of Caesars Enterprise Services, LLC, Caesars Palace LLC, and Tao Group and Omnia Nightclub to gather further information which is believed to help include facts to Plaintiff's Complaint. The documents and items requested from these entities will need to be reviewed in order to amend Plaintiff's Complaint and add parties. Due to delays in locating the entities, Plaintiff believes it is unlikely the documents will be received prior

1 to the current deadline to amend.

2 WHEREFORE, the parties respectfully request that this Court extend the time to file motions
3 to amend pleadings or to add parties by forty-five (45) days from the current deadline of September
4 18, 2025, up to and including November 3, 2025¹.

5 This request for an extension is made in good faith and joined by all the parties in this case.
6 The Request is timely pursuant to LR 26-3. Trial is not yet set in this matter and dispositive motions
7 have not yet been filed. Accordingly, this extension will not delay this case. Since this request is a
8 joint request, no party will be prejudiced.
9

10 **IT IS SO STIPULATED AND AGREED.**

11 DATED this 27th day of August, 2025.

DATED this 27th day of August, 2025.

12 **LAGOMARSINO LAW**

13 **KAEMPFER CROWELL**

14 /s/ Cristina P. Valentine, Esq.

/s/ Lyssa S. Anderson, Esq.

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Attorneys for Plaintiff

Attorney for Defendants

18 **IT IS SO ORDERED.**

19
20 By: 

Hon. Maximiliano D. Couvillier, III
UNITED STATES DISTRICT COURT JUDGE

Dated: August 28, 2025

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28 ¹ This deadline falls on November 2, 2025, which is a Sunday. As a result, this deadline extends to the next court day of Monday, November 3, 2025, by operation of FRCP 6.